

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

THE UNITED STATES OF AMERICA

vs.

CHRISTOPHER D. CASACCI,
d/b/a Exotic Cubs.com,

Defendant.

**NOTICE OF MOTION TO
EXTEND TIME FOR
DISCOVERY AND PRETRIAL
MOTIONS**

Docket No. 20-CR-5-A

MOTION MADE BY:

The defendant, **CHRISTOPHER D. CASACCI, D/B/A EXOTIC CUBS.COM**, by and through his attorneys **CONNORS LLP**.

**DATE, TIME AND PLACE
OF MOTION:**

At a date and time to be determined by the Hon. Michael J. Roemer, United States Magistrate Judge, Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202.

Oral argument is not requested.

RELIEF REQUESTED:

An Order of this Court extending Mr. Casacci's deadline for discovery and filing pretrial motions, together with such other and further relief as this Court deems just and proper.

**GROUND FOR
RELIEF REQUESTED:**

Discretion of this Court.

SUPPORTING PAPERS:

Declaration of Nicholas A. Romano, Esq., and all prior pleadings and proceedings.

DATED: March 9, 2020
Buffalo, New York

/s/Nicholas A. Romano

Nicholas A. Romano, Esq.

CONNORS LLP

Attorneys for Defendant

CHRISTOPHER D. CASACCI

1000 Liberty Building

Buffalo, New York 14202

(716) 852-5533

nar@connorsllp.com

TO: Aaron J. Mango, Esq.
Assistant United States Attorney
UNITED STATES ATTORNEY'S OFFICE
Federal Centre
138 Delaware Avenue
Buffalo, New York 14202
(716) 843-5700
aaron.mango@usdoj.gov

Patrick M. Duggan, Esq.
Trial Attorney
Environmental Crimes Section
U.S. DEPARTMENT OF JUSTICE
150 M Street, NE, Suite 4.123
4 Constitution Square
Washington, D.C. 20002
(202) 305-0366
patrick.duggan@usdoj.gov